

Sydney 4a
WA 2917
~~MARCH 1988~~
6/1/1989

APPENDIX IV

INSPECTION CHECKLISTS

FILE COPY

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EXHIBIT IV-1

GENERAL SITE INSPECTION INFORMATION FORM

A. Site Name Chemical Processors, Inc. B. Street (or other identifier) 2001 W. Garfield
C. City Seattle D. State WA E. Zip Code 98119 F. County Name King

G. Site Operator Information

1. Name Chemical Processors, Inc. 2. Telephone Number (206) 225-0500
3. Street 2203 Airport Way Suite 400 4. City Seattle 5. State WA 6. Zip Code 98134

H. Site Description

Oil Water treatment facility

I. Type of Ownership

☐ 1. Federal ☐ 2. State ☐ 3. County ☐ 4. Municipal ☒ 5. Private

J.

☐ 1. Generator ☐ 2. Transporter ☒ 3. Treatment ☒ 4. Storage ☒ 5. Disposal

K. Regulatory Status

☒ 1. Interim Status ☐ 3. Part B Permit Application Submitted
☐ 2. Permitted Facility ☐ 4. Part B Permit Application in Preparation

L.

1. Principal Inspector Name ESD 3. Organization (206) 442-7176
2. Title Sr. Compliance Investigator 4. Telephone No. (area code and No.)

M. Inspection Participants

1. <u>W. Douglas Smith</u>	6.
2.	7.
3.	8.
4.	9.
5.	10.

EXHIBIT IV-2

GENERAL FACILITY CHECKLIST

Section A - General Facility Standards

1. Does facility have EPA Identification No.? ☒ Yes ☐ No
 - a. If yes, EPA I.D. No. WAD 000812917
If no, explain. _____
2. Has facility received hazardous waste from a foreign source? ☐ Yes ☒ No
 - a. If yes, has it filed a notice with the Regional Administrator? ☒ Yes ☐ No

Waste Analysis

3. Does facility maintain a copy of the waste analysis plan at the facility? ☒ Yes ☐ No
 - a. If yes, does it include:
 1. Parameters for which each waste will be analyzed? ☒ Yes ☐ No
 2. Test methods used to test for these parameters? ☒ Yes ☐ No
 3. Sampling method used to obtain sample? ☒ Yes ☐ No
 4. Frequency with which the initial analyses will be reviewed or repeated? ☒ Yes ☐ No
 5. (For offsite facilities) waste analyses that generators have agreed to supply? ☒ Yes ☐ No
 6. (For offsite facilities) procedures which are used to inspect and analyze each movement of hazardous waste, including:
 - a. Procedures to be used to determine the identity of each movement of waste. ☒ Yes ☐ No
 - b. Sampling method to be used to obtain representative sample of the waste to be identified. ☒ Yes ☐ No

4. Does the facility provide adequate security through:
 - a. ~~24-hour surveillance system~~ (e.g., television monitoring ☒ Yes ☐ No or guards)? 24 hr.

OR

(continued)

EXHIBIT IV-2 (continued)

- b. 1. ~~Artificial~~ or natural barrier around facility ☒ Yes ☐ No
(e.g., fence or fence and cliff)?

Describe _____

AND

2. Means to control entry through entrances (e.g., ☒ Yes ☐ No
attendant, television monitors, locked entrance,
controlled roadway access)?

Describe _____

General Inspection Requirements

5. Does the owner/operator maintain a written schedule at the facility for inspecting:

- | | |
|--|---|
| a. Monitoring equipment? | <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No |
| b. Safety and emergency equipment? | <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No |
| c. Security devices: | <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No |
| d. Operating and structural equipment? | <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No |
| e. Types of problems of equipment: | |
| 1. Malfunction | <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No |
| 2. Operator error | <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No |
| 3. Discharges | <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No |

*Detected +
rectified*

6. Does the owner/operator maintain an inspection log? ☒ Yes ☐ No

- a. If yes, does it include: daily plant inspection

- | | |
|---|---|
| 1. Date and time of inspection? | <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No |
| 2. Name of inspector? | <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No |
| 3. Notation of observations? | <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No |
| 4. Date and nature of repairs or remedial action? | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No |

- b. *There are maintenance request forms but not tied to inspection logs by # or reference*
Are there any malfunctions or other deficiencies not corrected? (Use narrative explanation sheet.) ☐ Yes ☐ No

Personnel Training

7. Does the owner/operator maintain personnel training records at the facility? ☒ Yes ☐ No

(continued)

EXHIBIT IV-2 (continued)

How long are they kept? > 3.5 yrs

a. If yes, do they include:

1. Job title and written job description of each position? ☒ Yes ☐ No
2. Description of type and amount of training? ☒ Yes ☐ No
3. Records of training given to facility personnel? ☒ Yes ☐ No

Requirements for Ignitable, Reactive, or Incompatible Waste

8. Does facility handle ignitable or reactive wastes? ☒ Yes ☐ No

a. If yes, is waste separated and confined from sources of ignition or reaction (open flames, smoking, cutting and welding, hot surfaces, frictional heat), sparks (static, electrical, or mechanical), spontaneous ignition (e.g., from heat-producing chemical reactions), and radiant heat?

1. If yes, use narrative explanation sheet to describe separation and confinement procedures.
2. If no, use narrative explanation sheet to describe sources of ignition or reaction.

Tank separation to NFPA standards. No smoking from eqpt.

b. Are smoking and open flame confined to specifically designated locations? ☒ Yes ☐ No

c. Are "No Smoking" signs posted in hazardous areas? ☐ Yes ☐ No

d. Are precautions documented (Part 264 only)? ☐ Yes ☐ No

9. Check containers

a. Are containers leaking or corroding? ☐ Yes ☒ No

b. Is there evidence of heat generation from incompatible wastes? ☐ Yes ☒ No

Section B - Preparedness and Prevention

1. Is there evidence of fire, explosion, or contamination of the environment? ☒ Yes ☐ No

If yes, use narrative explanation sheet to explain.

(continued)

Water blow out fatality 11/23/80 Over 400 yds from blast point.

EXHIBIT IV-2 (continued)

2. Is the facility equipped with:

a. Internal communication or alarm system?

☒ Yes ☐ No

1. Is it easily accessible in case of emergency?

☒ Yes ☐ No

b. Telephone or two-way radio to call emergency response personnel?

☒ Yes ☐ No

c. Portable fire extinguishers, fire control equipment, spill control equipment, and decontamination equipment?

☒ Yes ☐ No

d. Water of adequate volume for hoses, sprinklers, or water spray system?

☒ Yes ☐ No

1. Describe source of water

200,000 water tank
pressure + reservoir for foam system

3. Is there sufficient aisle space to allow unobstructed movement of personnel and equipment?

☐ Yes ☐ No

4. Has the owner/operator made arrangements with the local authorities to familiarize them with characteristics of the facility? (Layout of facility, properties of hazardous waste handled and associated hazards, places where facility personnel would normally be working, entrances to roads inside facility, possible evacuation routes.)

☒ Yes ☐ No

5. In the case that more than one police or fire department might respond, is there a designated primary authority?

☐ Yes ☐ No

a. If yes, name primary authority

Station on Draves SFD

6. Does the owner/operator have phone numbers of and agreements with State emergency response teams, emergency response contractors, and equipment suppliers?

☒ Yes ☐ No

a. Are they readily available to all personnel?

☒ Yes ☐ No

7. Has the owner/operator arranged to familiarize local hospitals with the properties of hazardous waste handled and types of injuries that could result from fires, explosions, or releases at the facility?

☒ Yes ☐ No

8. If State or local authorities decline to enter, is this entered in the operating record?

☒ Yes ☐ No

(continued)

EXHIBIT IV-2 (continued)

Section C - Contingency Plan and Emergency Procedures

1. Is a contingency plan maintained at the facility? ☒ Yes ☐ No
- a. If yes, is it a revised SPCC Plan? ☐ Yes ☒ No *separate*
- b. Does contingency plan include:
1. Arrangements with local emergency response organizations? ☒ Yes ☐ No
2. Emergency coordinators' names, phone numbers, and addresses? ☒ Yes ☐ No
3. List of all emergency equipment at facility and descriptions of equipment? ☒ Yes ☐ No
4. Evacuation plan for facility personnel? ☒ Yes ☐ No
2. Is there an emergency coordinator on site or on call at all times? ☒ Yes ☐ No

Section D - Manifest System, Recordkeeping, and Reporting

1. Does facility receive waste from offsite? ☒ Yes ☐ No
- a. If yes, does the owner/operator retain copies of all manifests?
1. Are the manifests signed and dated and returned to the generator? ☒ Yes ☐ No
2. Is a signed copy given to the transporter? ☒ Yes ☐ No
2. Does the facility receive any waste from a rail or water (bulk shipment) transporter? ☒ Yes ☐ No
- a. If yes, is it accompanied by a shipping paper? ☒ Yes ☐ No
1. Does the owner/operator sign and date the shipping paper and return a copy to the generator? ☒ Yes ☐ No *all of*
2. Is a signed copy given to the transporter? ☒ Yes ☐ No *no manifest loading inspection*
3. Has the owner/operator received any shipments of waste that were inconsistent with the manifest (manifest discrepancies)? ☒ Yes ☐ No *being "No date" state thought from memory*
- a. If yes, has he attempted to reconcile the discrepancy with the generator and transporter? ☒ Yes ☐ No *Called Boeing 1990 Linda DeFuria*
1. If no, has Regional Administrator been notified? ☐ Yes ☒ No *Not date in*

(continued)

EXHIBIT IV-2 (continued)

4. Does the owner/operator keep a written operating record at the facility? *Not called "Operating Record" consists of Logs, receipts, work requests etc. day to day records of operation* ☒ Yes ☐ No

a. If yes, does it include:

1. Description and quantity of each hazardous waste received? ☒ Yes ☐ No
2. Methods and dates of treatment, storage, and disposal? ☒ Yes ☐ No
3. Location and quantity of each hazardous waste at each location? ☒ Yes ☐ No
4. Cross-references to manifests/shipping papers? ☒ Yes ☐ No
5. Records and results of waste analyses? ☒ Yes ☐ No
6. Report of incidents involving implementation of the contingency plan? ☒ Yes ☐ No
7. Records and results of required inspections? ☒ Yes ☐ No
8. Monitoring or testing analytical data (Part 264)? ☒ Yes ☐ No
9. Closure cost estimates and, for disposal facilities, post-closure cost estimates (Part 264)? ☒ Yes ☐ No
10. Notices of generators as specified in §264.12(b) (Part 264)? ☒ Yes ☐ No

5. Does the facility submit a biennial report by March 1 every even-numbered year? *Waste reduction measures March 1 - 1990 last previous was 1988* ☒ Yes ☐ No

a. If yes, do reports contain the following information: *Annual Report*

1. EPA I.D. number? ☒ Yes ☐ No
2. Date and year covered by report? ☒ Yes ☐ No
3. Description/quantity of hazardous waste? ☒ Yes ☐ No
4. Treatment, storage, and disposal methods? ☒ Yes ☐ No
5. Monitoring data under §265.94(a)(2) and (b)(2) (Part 265)? ☒ Yes ☐ No
6. Most recent closure and post-closure cost estimates? ☒ Yes ☐ No
7. For TSD generators, description of efforts to reduce volume/toxicity of waste generated, and actual comparisons with previous year? ☒ Yes ☐ No
8. Certification signed by owner/operator? ☒ Yes ☐ No

6. Has the facility received any waste (that does not come under the small generator exclusion) not accompanied by a manifest? ☒ Yes ☐ No

a. If yes, has he submitted an unmanifested waste report to the Regional Administrator? ☒ Yes ☐ No

7. Does the facility submit to the Regional Administrator reports on releases, fires, and explosions; contamination and monitoring data; and facility closure? ☒ Yes ☐ No

EXHIBIT IV-3

LAND DISPOSAL RESTRICTIONS CHECKLIST*

1. Are hazardous wastes land-disposed on site? ("Land disposal" includes placement in a landfill, surface impoundment, waste pile, injection well, land treatment facility, salt dome formation, salt bed formation, underground mine or cave, concrete vault, or bunker intended for disposal purposes; and placement in or on the land by means of open detonation and open burning where residues continue to exhibit hazardous characteristics). ☐ Yes ☐ No
 - a. If yes, are one or more of the following circumstances true:
 1. Granted extension from effective date pursuant to §268.5? ☐ Yes ☐ No
 2. Granted exemption from a prohibition pursuant to a petition under §268.6? ☐ Yes ☐ No
 3. Disposing of soil or debris resulting from a CERCLA response action or a RCRA corrective action, which will not be prohibited until November 8, 1988? ☐ Yes ☐ No
 4. Facility is a small quantity generator of less than 100 kg of hazardous waste per month? ☐ Yes ☐ No
2. Are restricted wastes or residuals from treatment of a restricted waste diluted in any way prior to disposal? ☐ Yes ☐ No
3. Are there active surface impoundments used for treatment of hazardous wastes? ☐ Yes ☐ No
 - a. If yes, does the unit's design and operation meet the requirements set forth in §268.4? ☐ Yes ☐ No
4. Has the facility sought exemption from any prohibition under Subpart C of §268 for the disposal of a restricted hazardous waste? ☐ Yes ☐ No
 - a. If yes, has the facility's demonstration included the required components (waste I.D., waste analysis, comprehensive environmental characterization of unit site, QA/QC plan, sampling, testing, modeling)? ☐ Yes ☐ No
5. Has the facility determined whether it generates a restricted waste through waste analysis? ☐ Yes ☐ No
 - a. If yes, is the facility, in fact, handling a restricted waste(s)? ☐ Yes ☐ No

(continued)

EXHIBIT IV-3 (continued)

- b. If yes, does the restricted waste require treatment? ☐ Yes ☐ No
- c. If yes, has the generator notified the treatment facility in writing, and does the notification include all required components ([PA hazardous waste number, corresponding treatment standard, manifest number of shipment])? ☐ Yes ☐ No
6. Does the facility handle EPA Hazardous Waste Nos. F001 through F005 (solvent wastes)? ☐ Yes ☐ No
- a. If yes, do any of the following conditions apply:
1. The generator of the solvent waste is a small quantity generator (not more than 1000 kg/month)? ☐ Yes ☐ No
 2. The solvent waste is generated from a CERCLA response corrective action? ☐ Yes ☐ No
 3. The solvent waste is a solvent-water mixture, solvent containing sludge, or Solvent-contaminated soil (non-CERCLA or RCRA corrective action) containing less than 1 percent total F001 through F005 solvent constituents. ☐ Yes ☐ No
- b. If no, have any of these restricted wastes been land-disposed (except in an injection well) since November 8, 1986? ☐ Yes ☐ No
7. Does the facility handle EPA Hazardous Waste Nos. F020, F021, F023, F026, F027, or F028 (dioxin-containing wastes)? ☐ Yes ☐ No
- a. If yes, do any of the following conditions apply:
1. Wastes are treated to meet standards of Subpart D of §268? ☐ Yes ☐ No
 2. Wastes are disposed of at a facility that has been granted a petition? ☐ Yes ☐ No
 3. An extension has been granted? ☐ Yes ☐ No
- b. If no, will these restricted wastes be land disposed after November 8, 1988? ☐ Yes ☐ No
8. Are restricted wastes being treated? ☐ Yes ☐ No
- a. If yes, have any of their associated hazardous constituents exceeded the "Constituent in Waste Extract" (CWE) levels? ☐ Yes ☐ No

*See OSWER Dir. No. 9938.1A (LDR Inspection Manual) for more detailed guidance!

EXHIBIT IV-4

GENERATOR'S CHECKLIST

Section A - EPA Identification No.

1. Does generator have EPA I.D. No?

☒ Yes ☐ No

a. If yes, EPA I.D. No. WAD 000812917

Section B - Manifest

1. Does generator ship waste offsite?

☒ Yes ☐ No

a. If no, do not fill out Sections B and D.

b. If yes, identify primary offsite facility(s). Use *Chem Waste Mgmt
Arlington, OK*
narrative explanation sheet.

2. Does generator use manifest?

☒ Yes ☐ No

a. If no, is generator a small quantity generator (generating between 100 and 1000 kg/month)?

☒ Yes ☐ No

1. If yes, does generator indicate this when sending waste to a TSD facility?

☒ Yes ☐ No

b. If yes, does manifest include the following information?

1. Manifest document No

☒ Yes ☐ No

2. Generator's name, mailing address, telephone No.

☒ Yes ☐ No

3. Generator EPA I.D. No.

☒ Yes ☐ No

4. Transporter Name(s) and EPA I.D. No.(s)

☒ Yes ☐ No

5. a. Facility name, address, and EPA I.D. No.

☒ Yes ☐ No

b. Alternate facility name, address, and EPA I.D. No.

☒ Yes ☐ No

c. Instructions to return to generator if undeliverable

☒ Yes ☐ No

6. Waste information required by DOE - shipping name, quantity (weight or vol.), containers (type and number)

☒ Yes ☐ No

(continued)

EXHIBIT IV-4 (continued)

7. Emergency information (optional)
(special handling instructions, telephone No.) ☒ Yes ☐ No

8. Is the following certification on each manifest form? ☐ Yes ☒ No

This is to certify that the above named materials are properly classified, described, packaged, marked, and labeled and are in proper condition for transportation according to the applicable regulations of the Department of Transportation and the EPA.

paraphrased only EPA uniform manifest has wrong

9. Does generator retain copies of manifests? ☒ Yes ☐ No

If yes, complete a through e.

- a. 1. Did generator sign and date all manifests? ☒ Yes ☐ No
2. Who signed for generator?

Name Operator, receiving on shift Title _____

- b. 1. Did generator obtain handwritten signature and date of acceptance from initial transporter? ☒ Yes ☐ No
2. Who signed and dated for transporter?

Name Usualy a Chem Pro Sub. Title Driver

- c. Does generator retain one copy of manifest signed by generator and transporter? ☒ Yes ☐ No

- d. Do returned copies of manifest include facility owner/operator signature and date of acceptance? ☒ Yes ☐ No

- e. Does generator retain copies for 3 years? ☒ Yes ☐ No

Section C - Hazardous Waste Determination

1. Does generator generate solid waste(s) listed in Subpart D (List of Hazardous Waste)? ☒ Yes ☐ No

- a. If yes, list waste and quantities Annual Reports + Part A
(include EPA Hazardous Waste No.)

(continued)

Most recent Part A was Sep 25, 1990

EXHIBIT IV-4 (continued)

2. Does generator generate solid waste(s) listed in Subpart C that exhibit hazardous characteristics? (corrosivity, ignitability, reactivity, EP toxicity) ☒ Yes ☐ No
- a. If yes, list wastes and quantities (include EPA Hazardous Waste No.) Annual reports
- b. Does generator determine characteristics by testing or by applying knowledge of processes? yes
1. If determined by testing, did generator use test methods in Part 261, Subpart C (or equivalent)? ☒ Yes ☐ No
- a. If equivalent test methods used, attach copy of equivalent methods used.
3. Are there any other solid wastes generated by generators? ☐ Yes ☒ No
- a. If yes, did generator test all wastes to determine nonhazardous characteristics? ☐ Yes ☐ No
1. If no, list wastes and quantities deemed nonhazardous or processes from which nonhazardous waste was produced (use additional sheet if necessary).
-
-
-

Section D - Pretransport Requirements

1. Does generator package waste in accordance with 49 CFR 173, 178, and 179 (DOT requirements)? ☒ Yes ☐ No
2. a. Are containers to be shipped leaking or corroding? ☒ Yes ☐ No
- b. Use sheet to describe containers and condition.
- c. Is there evidence of heat generation from incompatible wastes in the containers? ☐ Yes ☐ No
3. Does generator follow DOT labeling requirements in accordance with 49 CFR 172? ☒ Yes ☐ No
4. Does generator mark each package in accordance with 49 CFR 172? ☒ Yes ☐ No
- (continued)

EXHIBIT IV-4 (continued)

5. Is each container of 110 gallons or less marked with the following label?

☒ Yes ☐ No

Label saying: HAZARDOUS WASTE - Federal Law Prohibits Improper Disposal. If found, contact the nearest police or public safety authority or the U.S. Environmental Protection Agency. and WDOE

Generator name(s) and address(es) yes

Manifest document No. yes

6. Does generator have placards to offer to transporters?

☒ Yes ☒ No

Self transport thru subsidiary.

7. Accumulation time

- a. Are containers used to temporarily store waste before transport?

☒ Yes ☐ No

1. If yes, is each container clearly dated: Also, fill out rest of No. 7 (accum. time)

☒ Yes ☐ No

- b. 1. Does generator inspect containers for leakage or corrosion? (265.174 - Inspections)

☒ Yes ☐ No

2. If yes, with what frequency?

Daily

- c. Does generator locate containers holding ignitable or reactive waste at least 15 meters (50 feet) from the facility's property line? (265.176 - Special Requirements for Ignitable or Reactive Wastes)

Yes ☒ No ☐
If they had it they would.

NOTE: If tanks are used, fill out checklist for tanks.

- d. Are the containers labeled and marked in accordance with Section D-3, -4, and -5 of this form?

☐ Yes ☐ No

NOTE: If generator accumulates waste on site, fill out checklist for General Facilities, Subparts C and D.

- e. Does generator comply with requirements for personnel training? (Attach checklist for 265.16 - Personnel Training.)

☒ Yes ☐ No

8. Describe storage area. Use photos and narrative explanation sheet.

EXHIBIT IV-4 (continued)

Section E - Recordkeeping and Records

1. Does generator keep the following reports for 3 years?

- | | |
|---|---|
| a. Manifests and signed copies from designated facilities | <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No |
| b. Annual reports | <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No |
| c. Exception reports <i>Done on manifest (1990 Acetone)</i> | <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No |
| d. Test results | <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No |

2. Where are the records kept (at facility or elsewhere)? also Georgetown

3. Who is in charge of keeping the records?

Name Cary Marinoto Title Co. Accountant

Section F - Special Conditions

1. Has generator received from or transported to a foreign source any hazardous waste?

☒ Yes ☐ No *Canada from AK*

- | | |
|--|--|
| a. If yes, has he filed a notice with the Regional Administrator? | <input type="checkbox"/> Yes <input type="checkbox"/> No |
| b. Is this waste manifested and signed by a foreign cosignee? | <input type="checkbox"/> Yes <input type="checkbox"/> No |
| c. If generator transported wastes out of the country, has he received confirmation of delivered shipment? | <input type="checkbox"/> Yes <input type="checkbox"/> No |

EXHIBIT IV-5

TRANSPORTERS CHECKLIST

Section A - EPA I.D. No.

1. Does transporter have an EPA I.D. No.?
☒ Yes ☐ No
- a. If yes, what is EPA I.D.? WAD000812917

Section B - Transfer Facility Requirements

1. Does transporter store wastes on site?
☒ Yes ☐ No
- a. If yes, does transporter store wastes longer than 10 days?
☐ Yes ☒ No

Section C - Manifests

1. Does transporter use manifests?
☒ Yes ☐ No
- a. If yes, are manifests signed and dated?
☒ Yes ☐ No
- b. Does transporter return signed copies of manifests to generators?
☒ Yes ☐ No
- c. Does transporter carry manifests with waste shipments?
☒ Yes ☐ No
- d. Does transporter obtain delivery date and signature of owner/operator at delivery?
☒ Yes ☐ No
- e. Does transporter retain copies?
☒ Yes ☐ No
- f. Does transporter give remaining copies to accepting transporter or facility?
☒ Yes ☐ No
- g. Is transporter a water (bulk shipment) transporter?
☒ Yes ☐ No
1. If yes, is waste delivered to receiving facility by water?
☒ Yes ☐ No
2. Does transporter carry a shipping paper with the waste containing all information required on the manifest (excluding EPA I.D. numbers, generator certification, and signatures)?
☒ Yes ☐ No
3. Does transporter obtain delivery date and handwritten signature of owner/operator of designated facility on manifest or shipping paper?
☒ Yes ☐ No
4. Does transporter retain copies of shipping papers or manifests, in accordance with §263.22?
☒ Yes ☐ No

(continued)

EXHIBIT IV-5 (continued)

- h. Is transporter a rail transporter? ☒ Yes ☐ No
1. If yes, when accepting waste from a nonrail transporter, does rail transporter sign and date manifest acknowledging acceptance of waste? ☒ Yes ☐ No
2. Does rail transporter return a signed copy of manifest to nonrail transporter? ☒ Yes ☐ No
3. Does rail transporter forward manifest copies to:
- a. The next nonrail transporter? ☒ Yes ☐ No
- b. Designated receiving facility (if reached by rail)? ☒ Yes ☐ No
- c. The last rail transporter designated to handle the waste in the U.S.? ☒ Yes ☐ No
4. Does rail transporter retain a copy of manifest? ☒ Yes ☐ No
5. Does rail transporter ensure that a shipping paper accompanies the hazardous waste and contains all information required on manifest (excluding EPA I.D., generator certification, and signatures)? ☒ Yes ☐ No
6. Does rail transporter obtain delivery date and handwritten signature of owner/operator of designated facility or the next nonrail transporter on manifest? ☒ Yes ☐ No
7. Does rail transporter retain a copy of the manifest or signed shipping paper? ☒ Yes ☐ No
- i. Does transporter transport waste outside of the U.S.? ☒ Yes ☐ No *not determined*
1. If yes, does the transporter:
- a. Indicate on manifests the date that shipment left the U.S.? ☐ Yes ☐ No
- b. Sign manifest and retain one copy? ☐ Yes ☐ No
- c. Return a signed copy of manifest to generator? ☐ Yes ☐ No

Section D - Compliance With the Manifest

1. Does transporter deliver entire shipment of hazardous waste to:
- a. Designated facility listed on manifest? ☒ Yes ☐ No
- b. Alternate designated facility, if emergency prevents delivery to designated facility? ☒ Yes ☐ No
- c. Next designated transporter? ☒ Yes ☐ No
- d. Place outside U.S. designated by generator? ☒ Yes ☐ No
- e. If no, does transporter contact generator for further directions, and then revise manifest accordingly? ☒ Yes ☐ No

(continued)

secondary company used

EXHIBIT IV-5 (continued)

Section E - Recordkeeping

1. Does transporter keep a copy of manifest signed by generator, ☒ Yes ☐ No himself, and next designated transporter for 3 years?
2. Does water (bulk shipment) transporter retain copy of shipping paper for each shipment delivered by water? ☒ Yes ☐ No
3. Does initial rail transporter keep a copy of manifest and/or shipping paper? ☒ Yes ☐ No
4. Does transporter shipping waste outside of the U.S. keep ~~☐ Yes ☐ No~~ for 3 years copy indicating that waste was shipped?

EXHIBIT IV-6

CONTAINERS CHECKLIST

Section A - Use and Management

1. Are containers in good condition? ☐ Yes ☐ No

Section B - Compatibility of Waste With Container

1. Is container made of a material that will not react with the waste which it stores? ☒ Yes ☐ No

Section C - Management of Containers

1. Is container always closed while holding hazardous waste? ☒ Yes ☐ No
2. Is container handled so that it will not be opened, handled, or stored in a manner which may rupture it or cause it to leak? ☒ Yes ☐ No

Section D - Inspections

1. Does owner/operator inspect containers at least weekly for leaks and deterioration? ☒ Yes ☐ No

Section E - Containment (Part 264)

1. Do container storage areas have a containment system? ☐ Yes ☐ No

90 days

Section F - Ignitable and Reactive Waste

1. Are containers holding ignitable and reactive waste located at least 15 m (50 ft) from facility property lines? ☐ Yes ☒ No

Section G - Incompatible Waste

1. Are incompatible wastes or materials placed in the same containers? ☐ Yes ☒ No
2. Are hazardous wastes placed in washed, clean containers when they previously held incompatible waste? ☒ Yes ☐ No

(continued)

EXHIBIT IV-6 (continued)

3. Are incompatible hazardous wastes separated from each other by a berm, dike, wall, or other device? Yes No
no incompatible

Section H - Closure (Part 264)

1. At closure, were all hazardous wastes and associated residues removed from the containment system? Yes No
- 

EXHIBIT IV-7

SURFACE IMPOUNDMENTS CHECKLIST

Section A - Design Requirements

1. Does facility operate one or more surface impoundments? ☐ Yes ☐ No
- a. If yes, has owner/operator installed two or more liners and a leachate collection system for any new units, replacement of any existing units, or lateral expansion of units? ☐ Yes ☐ No
- b. Is owner/operator exempt from double-liner leachate collection system requirements because Regional Administrator has determined that impoundment's design will prevent the migration of hazardous constituents? ☐ Yes ☐ No
- c. Did owner/operator notify Regional Administrator 60 days prior to receiving waste (Part 265)? ☐ Yes ☐ No
- d. If impoundment does not have a double liner, is it exempt due to one of the following reasons? ☐ Yes ☐ No
1. Monofill contains only wastes from a foundry furnace emission controls or metal casting molding sand.
2. Monofill has at least one liner for which there is no evidence of leaking.
3. Monofill is located, designed, and operated to ensure that no migration of constituents into ground or surface water occurs.
- e. Does owner/operator take measures to prevent overfilling; wind and wave action; rainfall; run-on; malfunctions of level controllers, alarms, and other equipment; and human error (Part 264)? ☐ Yes ☐ No
- f. Is impoundment surrounded by dikes (Part 264)? ☐ Yes ☐ No

Section B - Operating Requirements

1. Does owner/operator maintain at least 60 cm (2 ft) of freeboard (Part 265)? ☐ Yes ☐ No

(continued)

EXHIBIT IV-7 (continued)

- a. If no, does owner/operator have certification by a qualified engineer? ☐ Yes ☐ No

Section C - Containment System

1. Do all earthen dikes have a protective cover (e.g., grass, gravel) to minimize erosion? ☐ Yes ☐ No

Section D - Waste Analysis and Trial Tests

1. Are wastes treated in the surface impoundment? (if yes, explain on a narrative sheet) ☐ Yes ☐ No
2. Has the owner/operator chemically treated a waste (or planning to) which is substantially different than previously treated wastes? ☐ Yes ☐ No
3. Has the owner/operator chemically treated a waste (or planning to) using a process that is substantially different from that previously used? ☐ Yes ☐ No
4. If yes to 2 or 3 above, have waste analyses and trial treatment tests been conducted? ☐ Yes ☐ No
- a. If not, does owner/operator have written documentation on similar treatment of similar wastes? ☐ Yes ☐ No

Section E - Inspections

1. Does owner/operator check freeboard level daily? ☐ Yes ☐ No
2. Are the surface impoundment, dikes, and surrounding vegetation inspected weekly for deterioration of failures? ☐ Yes ☐ No
3. If regulated under Part 264, does owner/operator:
- a. Inspect liners for imperfections (tears and punctures for synthetic liners and cracks, root holes, etc., for soil-based liners) during construction and installation? ☐ Yes ☐ No
- b. Inspect the operating impoundment weekly and after storms to detect evidence of deterioration, malfunction, and overtopping? ☐ Yes ☐ No
- c. Have certification that the dike will withstand stresses from the amount and type of waste to be held and will not fail due to cleaning? ☐ Yes ☐ No

EXHIBIT IV-7 (continued)

Section F - Emergency Repairs, Contingency Plans (part 264)

1. Does facility have a contingency plan? ☐ Yes ☐ No
- a. If yes, does plan stipulate that impoundment be removed from service under the following conditions:
1. Sudden drop in liquid level? ☐ Yes ☐ No
2. Leaking dike? ☐ Yes ☐ No
- b. Does plan detail the steps to be followed when removing impoundment from service, including:
1. Shutting off flow into impoundment? ☐ Yes ☐ No
2. Containing any surface leakage? ☐ Yes ☐ No
3. Stopping the leak? ☐ Yes ☐ No
4. Notifying Regional Administrator of problems in writing if leaks cannot be contained? ☐ Yes ☐ No
- c. If impoundment was removed from service, did owner/operator take the necessary precautions to rectify problems before restoring impoundment to service? ☐ Yes ☐ No
- d. If impoundment was removed from service and was not restored to service, was impoundment closed in accordance with an approved closure plan? ☐ Yes ☐ No

Section G - Closure and Post-Closure

1. Is a closure plan retained at the facility? ☐ Yes ☐ No
2. At closure, did owner/operator:
- a. Remove standing liquids (Part 265)? ☐ Yes ☐ No
- b. Remove waste and waste residue (Part 265)? ☐ Yes ☐ No
- c. Remove liner (Part 265)? ☐ Yes ☐ No
- d. Remove underlying and surrounding contaminated soil? ☐ Yes ☐ No

(continued)

EXHIBIT IV-7 (continued)

- e. If not, did owner/operator demonstrate to Regional Administrator that the above materials were nonhazardous (Part 265)? ☐ Yes ☐ No
1. If no, has owner/operator closed the impoundment and provided post-closure care (Part 265)? ☐ Yes ☐ No
3. If regulated under Part 264, has owner/operator:
- a. Removed or decontaminated waste residues, contaminated system components, subsoils, structures, and equipment, and managed them as hazardous waste? ☐ Yes ☐ No
- b. Eliminated free liquids by removing or solidifying remaining wastes or waste residues? ☐ Yes ☐ No
- c. Stabilized remaining wastes to a bearing capacity sufficient to support final cover? ☐ Yes ☐ No
- d. Covered the impoundment with final cover? ☐ Yes ☐ No
4. Did owner/operator leave any residuals in place at closure (Part 264)? ☐ Yes ☐ No
5. In post-closure, does owner/operator maintain integrity of cover and ground-water monitoring system, and prevent run-on and runoff? ☐ Yes ☐ No

Section H - Ignitable and Reactive Wastes

1. Are ignitable or reactive wastes placed in the impoundment? ☐ Yes ☐ No
- a. If no, do not complete b and c.
- b. If yes, are they treated, rendered, or mixed before or immediately after placement in the impoundment so it no longer meets the definition of ignitable or reactive? ☐ Yes ☐ No
- OR
- c. Is the impoundment used solely for emergencies? ☐ Yes ☐ No

Section I - Incompatible Wastes

1. Are incompatible wastes placed in the impoundment? ☐ Yes ☐ No

EXHIBIT IV-7 (continued)

- a. If ~~yes~~, has the owner/operator taken precautions to prevent accidental ignition or reaction?

☐ Yes ☐ No

For facilities regulated under Part 264:

Section J - Special Requirements for Hazardous Wastes F020, F021, F022, F023, F026, F027

1. Does the impoundment contain hazardous waste numbers F020, F021, F022, F023, F026, F027?

☐ Yes ☐ No

- a. If yes, does the owner/operator operate the impoundment in accordance with a management plan approved by the Regional Administrator or comparable state authority?

☐ Yes ☐ No

EXHIBIT IV-8

WASTE PILES CHECKLIST

Section A - Design and Operating Requirements

1. Is the pile containing hazardous waste protected from wind? ☐ Yes ☐ No
2. Does waste pile have a liner and leachate collection system (Part 264)? ☐ Yes ☐ No
 - a. If no, has facility proved to Regional Administrator that waste pile's design characteristics will prevent migration of hazardous constituents into ground water (Part 264)? ☐ Yes ☐ No
3. Is run-on diverted around active portion (Part 264)? ☐ Yes ☐ No
4. Is runoff collected and controlled (Part 264)? ☐ Yes ☐ No
5. Are collection and holding facilities emptied after storms? ☐ Yes ☐ No

Section B - Waste Analysis (Part 265)

1. Is a representative sample of waste from each incoming shipment analyzed before the waste is added to the pile to determine the compatibility of the wastes? ☐ Yes ☐ No
2. Does the analysis include a visual comparison of color or texture? ☐ Yes ☐ No

Section C - Containment (Part 265)

1. Is the leachate or runoff from the pile considered a hazardous waste? ☐ Yes ☐ No
 - a. If yes, is the pile managed with the following:
 1. An impermeable base compatible with the waste? ☐ Yes ☐ No
 2. Run-on diversion? ☐ Yes ☐ No
 3. Leachate and runoff collection? ☐ Yes ☐ No
 4. Are collection and holding facilities periodically emptied? ☐ Yes ☐ No
 - OR
 5. Is the pile protected from precipitation and run-on by some other means? ☐ Yes ☐ No

EXHIBIT IV-8 (continued)

Section D - Monitoring and Inspection (Part 264)

1. Are liners and covers inspected for damage during construction? __Yes __No
2. Are waste piles inspected weekly for deterioration, run-on and runoff controls, wind dispersal control, and proper function of leachate collection system? __Yes __No

Section E - Ignitable or Reactive Wastes

1. Are ignitable or reactive wastes placed in the pile? __Yes __No
 - a. If yes, does the addition of the waste result in the waste or mixture no longer meeting the definition?
(Use narrative explanation sheet to describe procedure.) __Yes __No
 - OR
 - b. Is the waste protected from sources of ignition or reaction? __Yes __No
 1. If yes, use narrative explanation sheet to describe separation and confinement procedures.
 2. If no, use narrative explanation sheet to describe sources of ignition or reaction.

Section F - Incompatible Wastes

1. Are incompatible wastes placed together in the pile? __Yes __No
2. Are incompatible wastes separated from each other by a dike, berm, or wall? __Yes __No
3. Is there evidence of fire, explosion, gaseous emissions, leaching, or other discharge? (Use narrative explanation sheet.) __Yes __No

Section G - Closure and Post-Closure

1. Is a closure plan retained at the facility? __Yes __No
- (continued)

EXHIBIT IV-8 (continued)

2. At closure, were all waste residues, contaminated system components, contaminated subsoils, and contaminated structures and equipment removed or decontaminated? ☐ Yes ☐ No
3. Were all contaminated subsoils removed from the site? ☐ Yes ☐ No
- a. If no, did owner/operator close the facility and perform closure and post-closure care in accordance with §264.310 and 265.310? ☐ Yes ☐ No
4. Is a plan for complying with No. 2 above included in closure plan? ☐ Yes ☐ No
5. Is a contingency plan for complying with No. 3a above included in the plan? ☐ Yes ☐ No
6. Is a contingency post-closure plan included? ☐ Yes ☐ No
7. Are cost estimates included in closure plan? ☐ Yes ☐ No

Section H - Requirements for Wastes F020, F021, F022, F023, F026, and F027

1. Does facility place these F wastes in a waste pile? ☐ Yes ☐ No
- a. If yes, does facility have an approved management plan for these wastes? ☐ Yes ☐ No

EXHIBIT IV-9

LAND TREATMENT CHECKLIST

Section A - Treatment Program (Part 264)

1. Does facility follow an approved land treatment program? ☐ Yes ☐ No

Section B - Treatment Demonstration (Part 264)

1. Has owner/operator demonstrated to Regional Administrator that hazardous wastes used in the program are completely degraded, transformed, or immobilized? ☐ Yes ☐ No

Section C - Operating Requirements

- | | | |
|--|------------------------------|-----------------------------|
| 1. Is run-on diverted away from the land treatment facility? | <input type="checkbox"/> Yes | <input type="checkbox"/> No |
| 2. Is runoff from the land treatment facility collected? | <input type="checkbox"/> Yes | <input type="checkbox"/> No |
| 3. Are holding facilities emptied after storms? | <input type="checkbox"/> Yes | <input type="checkbox"/> No |
| 4. Is the runoff analyzed to see if it is a hazardous waste? | <input type="checkbox"/> Yes | <input type="checkbox"/> No |
| 5. Is facility managed to control dispersal? | <input type="checkbox"/> Yes | <input type="checkbox"/> No |
| 6. Is unit inspected weekly (Part 264)? | <input type="checkbox"/> Yes | <input type="checkbox"/> No |

Section D - Waste Analysis (Part 265)

1. If the runoff is considered hazardous, how is it handled?
(Use narrative explanation sheet.)
2. If it is not a hazardous waste, is it discharged through a point source to surface waters? ☐ Yes ☐ No
- a. If yes, list NPDES Permit No. _____
3. What hazardous wastes are treated at the land treatment facility?

Subpart D Listed Wastes

Characteristic Wastes (EP Toxicity)

(continued)

LAND TREATMENT #2

EXHIBIT IV-9 (continued)

- a. For these listed wastes, were analyses done to determine the concentrations of these constituents which caused the waste to be listed? __Yes __No

1. If yes, what are these concentrations? (Use narrative explanation sheet.)

- b. For those characteristic wastes (EP) toxicity, what are the concentrations of the following:

Concentration, mg/liter

Waste

Arsenic
Barium
Cadmium
Chromium
Lead
Mercury
Selenium
Silver
Endrin
Lindane
Methoxychlor
Toxphene
2,4-D
2,4,5-TP silvex

Section E - Food-Chain Crops

1. Are food-chain crops grown? __Yes __No

- a. If yes, what are the concentrations of the following in the soil and vegetation:

Soil concentration,
mg/liter

Vegetation concentration,
mg/liter

Arsenic
Cadmium
Lead
Mercury

2. Did the facility notify Regional Administrator that he is growing food-chain crops (Part 265)? __Yes __No

(continued)

EXHIBIT IV-9 (continued)

3. Has owner/operator demonstrated that no harm is done to health or environment (Part 264)? ☐ Yes ☐ No
4. Has owner/operator demonstrated that any arsenic, lead, mercury, or other constituents under 265.273(b) will not be transported to crops (Part 265)? ☐ Yes ☐ No
3. Does the facility treat waste that contains cadmium? ☐ Yes ☐ No
- a. If no, do not fill out b.
- b. If yes, was the pH of the soil and waste mixture 6.5 or greater at the time of each waste application? ☐ Yes ☐ No
1. If the pH was less than 6.5, did the waste contain cadmium concentrations of 2 mg/kg or less? ☐ Yes ☐ No

Section F - Unsaturated-Zone Monitoring

1. Is an unsaturated-zone monitoring plan kept at the facility (Part 265)? ☐ Yes ☐ No
2. Does owner/operator perform the following:
- a. Soil monitoring? ☐ Yes ☐ No
- b. Soil-pore water monitoring? ☐ Yes ☐ No
- c. Sample depths below waste incorporation? ☐ Yes ☐ No
- d. Background values (Part 264)? ☐ Yes ☐ No
- e. Consistent sampling and analysis procedures? ☐ Yes ☐ No
- f. Determination of significant changes? ☐ Yes ☐ No
- g. Notification when change is found? ☐ Yes ☐ No
3. Does plan include the following (Part 265):
- a. Depth of sampling? ☐ Yes ☐ No
- b. Number of samples? ☐ Yes ☐ No
- c. Frequency and timing of samples? ☐ Yes ☐ No
4. Does owner/operator analyze for hazardous waste constituents? ☐ Yes ☐ No

(continued)

EXHIBIT IV-9 (continued)

Section G - Recordkeeping

1. Are records kept at the facility of:

- | | | |
|-----------------------|------------------------------|-----------------------------|
| a. Application dates? | <input type="checkbox"/> Yes | <input type="checkbox"/> No |
| b. Application rates? | <input type="checkbox"/> Yes | <input type="checkbox"/> No |
| c. Quantities? | <input type="checkbox"/> Yes | <input type="checkbox"/> No |
| d. Waste location? | <input type="checkbox"/> Yes | <input type="checkbox"/> No |

Section H - Closure and Post-Closure

1. Is a copy of the closure/post-closure plan kept at the facility? ☐ Yes ☐ No

2. Does closure plan address the following (Part 265):

- | | | |
|--|------------------------------|-----------------------------|
| a. Control of the migration of hazardous waste and hazardous waste constituents from the treated area into the ground water? | <input type="checkbox"/> Yes | <input type="checkbox"/> No |
| b. Control of the release of contaminated runoff from the facility into surface water? | <input type="checkbox"/> Yes | <input type="checkbox"/> No |
| c. Control of the release of airborne particulate contaminants caused by wind erosion? | <input type="checkbox"/> Yes | <input type="checkbox"/> No |
| d. Compliance with §265.276 concerning the growth of food-chain crops? | <input type="checkbox"/> Yes | <input type="checkbox"/> No |

3. Does owner/operator ensure the following during closure (Part 764):

- | | | |
|---|------------------------------|-----------------------------|
| a. Maintenance of monitoring systems on unsaturated zone? | <input type="checkbox"/> Yes | <input type="checkbox"/> No |
| b. Maintenance of run-on controls? | <input type="checkbox"/> Yes | <input type="checkbox"/> No |
| c. Maintenance of runoff management system? | <input type="checkbox"/> Yes | <input type="checkbox"/> No |
| d. Wind dispersal control? | <input type="checkbox"/> Yes | <input type="checkbox"/> No |
| e. Attempt to maximize degradation, transformation, and immobilization of hazardous waste constituents? | <input type="checkbox"/> Yes | <input type="checkbox"/> No |
| f. Continue to comply with any prohibitions or conditions concerning growth of food-chain crops? | <input type="checkbox"/> Yes | <input type="checkbox"/> No |

(continued)

EXHIBIT IV-9 (continued)

- g. Continue unsaturated-zone monitoring in compliance with 264.278? ☐ Yes ☐ No
- h. Establish a vegetative cover on the portion of the facility being closed at such time that the cover will not substantially impede degradation, transformation, or immobilization of hazardous constituents in the treatment zone? ☐ Yes ☐ No
4. During post-closure care, does owner/operator:
- a. Continue all operations (including pH control) necessary to enhance degradation and transformation and sustain immobilization of hazardous constituents in the treatment zone? ☐ Yes ☐ No
- b. Maintain a vegetative cover over closed portions of the facility? ☐ Yes ☐ No
- c. Maintain the run-on control system required under §264.273(c)? ☐ Yes ☐ No
- d. Maintain the runoff management system required under §264.273(d)? ☐ Yes ☐ No
- e. Control wind dispersal of hazardous waste if required under §264.273(f)? ☐ Yes ☐ No
- f. Continue to comply with any prohibitions or conditions concerning growth of food-chain crops under §264.276? ☐ Yes ☐ No
- g. Continue unsaturated-zone monitoring in compliance with §264.278? ☐ Yes ☐ No
5. Does facility have certification that closure was performed according to plan? ☐ Yes ☐ No
- a. Was certification submitted to Regional Administrator (Part 265)? ☐ Yes ☐ No
6. Does owner/operator continue the following during post-closure (Part 265)?
- a. Soil-pore monitoring by collecting and analyzing samples as specified in the plan? ☐ Yes ☐ No

(continued)

EXHIBIT IV-9 (continued)

- b. Restrict access? ☐ Yes ☐ No
- c. Assure that growth of food-chain crops is in compliance? ☐ Yes ☐ No
- d. Control wind dispersal? ☐ Yes ☐ No

Section I - Ignitable or Reactive Wastes

1. Are ignitable or reactive wastes placed in the facility? ☐ Yes ☐ No
- a. If yes, are the wastes treated, rendered, or mixed before or after placement in the landfill so it is no longer reactive or ignitable? ☐ Yes ☐ No
- b. Describe or attach a copy of treatment.

Section J - Incompatible Wastes

1. Are incompatible wastes placed in the facility? ☐ Yes ☐ No
- a. Are the incompatible wastes placed in different locations in the facility? ☐ Yes ☐ No

EXHIBIT IV-10
LANDFILLS CHECKLIST

Section A - Design Requirements

1. Does landfill have two or more liners and a leachate collection system between the liners? __Yes __No
2. Did owner/operator notify Regional Administrator 60 days prior to receiving waste (Part 265)? __Yes __No
3. If landfill does not have two liners and a leachate collection system, did owner/operator adequately demonstrate to Regional Administrator that alternate design and operation prevents migration of hazardous constituents? __Yes __No
4. If no double liner exists, does landfill fall into one of the following exemption categories:
 - a. Monofill only holds wastes from foundry furnace emission controls or metal casting molding sand? __Yes __No
 - b. Monofill has at least one liner and there is no evidence that liner is leaking? __Yes __No
 - c. Owner/operator demonstrates that monofill is located, designed, and operated to prevent migration of hazardous constituents? __Yes __No
5. If landfill does not have two liners and a leachate collection system, does it have at least one liner for all existing portions (Part 264)? __Yes __No
 - a. If yes, does this liner provide for the following:
 1. To prevent migration of wastes out of landfill to subsurface soil, ground water, and surface water (Part 264)? __Yes __No
 2. A leachate collection and removal system immediately above the liner constructed to be chemically resistant to the waste and strong enough not to collapse under pressure (Part 264)? __Yes __No
6. If owner/operator does not comply with No. 5 above, is he exempt after demonstrating to Regional Administrator that alternate design and operation prevents migration of hazardous constituents (Part 264)? __Yes __No

(continued)

EXHIBIT IV-10 (continued)

Section B - Operating Requirements

1. Are run-on controls preventing flow onto the active portion of the landfill? ☐ Yes ☐ No
2. Is runoff collected and controlled? ☐ Yes ☐ No
3. Are collection and holding facilities emptied after storms? ☐ Yes ☐ No
4. Is the landfill managed so that wind dispersal is controlled? ☐ Yes ☐ No

Section C - Monitoring and Inspection (Part 264)

1. Are liners inspected for defects during and after construction? ☐ Yes ☐ No
2. Are landfills inspected weekly and after storms for defects? ☐ Yes ☐ No

Section D - Surveying and Recordkeeping

1. Does owner/operator retain records at the facility? ☐ Yes ☐ No
 - a. If yes, are the following maintained:
 1. On map, exact location and dimensions, including depths, of each cell? ☐ Yes ☐ No
 2. Contents of each cell and approximate location of each hazardous waste type within the cell? ☐ Yes ☐ No

Section E - Closure and Post-Closure

1. Is a closure plan kept on site? ☐ Yes ☐ No
 - a. If yes, does cover provide for the following:
 1. Minimizing migration of liquids? ☐ Yes ☐ No
 2. Minimum maintenance? ☐ Yes ☐ No
 3. Promote drainage; minimize erosion? ☐ Yes ☐ No
 4. Accommodate settling and subsidence? ☐ Yes ☐ No
 5. Less permeable than bottom liner or natural subsoils? ☐ Yes ☐ No
 - b. After final closure, does owner/operator provide for the following:

(continued)

EXHIBIT IV-10 (continued)

1. Maintain final cover? ☐ Yes ☐ No
2. Continue to operate leachate collection and removal system until leachate is no longer collected? ☐ Yes ☐ No
3. Maintain ground-water monitoring? ☐ Yes ☐ No
4. Prevent run-on and runoff from eroding and damaging cover? ☐ Yes ☐ No
5. Protect and maintain surveyed bench marks? ☐ Yes ☐ No

Section F - Ignitable and Reactive Waste

1. Are ignitable or reactive wastes placed in the landfill? ☐ Yes ☐ No
 - a. If yes, is waste treated, rendered, or mixed before or immediately after placement so that it is no longer ignitable or reactive? ☐ Yes ☐ No
2. Are ignitable wastes in containers placed in landfill? ☐ Yes ☐ No
 - a. If yes, attach a narrative describing how these wastes are handled to prevent ignition or reaction?

Section G - Incompatible Wastes

1. Does owner/operator place incompatible wastes in landfill? ☐ Yes ☐ No

Section H - Bulk and Containerized Liquids

1. Does landfill receive any bulk or containerized liquid hazardous waste? ☐ Yes ☐ No
 - a. If yes, have they been added to landfill since May 8, 1985? ☐ Yes ☐ No
2. Does landfill receive containers of free liquids? ☐ Yes ☐ No
 - a. If yes, is at least one of the following conditions met:
 1. Have free-standing liquids been removed by decanting or other methods; or have they been mixed with absorbent or solidified? ☐ Yes ☐ No
 2. Are containers ampules? ☐ Yes ☐ No
 3. Is container designed to hold free liquids? ☐ Yes ☐ No
 4. Is container a lab pack? ☐ Yes ☐ No

(continued)

EXHIBIT IV-10 (continued)

3. Have containers holding liquids that are not hazardous wastes ☐ Yes ☐ No been placed in the landfill since November 8, 1985?

a. If, yes, is one of the following conditions met:

1. Was it the only reasonable alternative to place it in a landfill or unlined impoundment? ☐ Yes ☐ No
2. Did placement not present a risk to contaminating any underground source of drinking water? ☐ Yes ☐ No

Section I - Container Requirements

1. Are containers placed in the landfill? ☐ Yes ☐ No

a. If yes, are they either:

1. 90 percent full? ☐ Yes ☐ No
2. Crushed, shredded, or similarly reduced in volume? ☐ Yes ☐ No

Section J - Overpacked Drums

1. Are small containers of hazardous waste placed in landfill? ☐ Yes ☐ No

a. If yes, are the following requirements met?

1. Waste packaged in non-leaking container and tightly sealed? ☐ Yes ☐ No
- b. Containers not overpacked according to DOT regulations? ☐ Yes ☐ No
- c. Absorbent material does not react with waste? ☐ Yes ☐ No
- d. Incompatible wastes not placed outside the same container? ☐ Yes ☐ No
- e. Reactive waste treated or rendered nonactive before packaging? ☐ Yes ☐ No

Section K - F020, F021, F022, F023, F026, and F027 Wastes (Part 264 only)

1. Are these wastes placed in landfill? ☐ Yes ☐ No

a. If yes, did owner/operator receive permission from Regional Administrator to do so? ☐ Yes ☐ No

b. Is documentation of "a" above on file at facility? ☐ Yes ☐ No

EXHIBIT IV-11

INCINERATORS CHECKLIST

Section A - Waste Analysis (Part 265 only)

1. Does owner/operator analyze all wastes he has not previously burned to enable him to establish steady-state operating conditions? ☐ Yes ☐ No
 - a. If yes, does analysis include:
 1. Determination of heating value? ☐ Yes ☐ No
 2. Determination of halogen and sulfur content? ☐ Yes ☐ No
 3. Concentrations of lead and mercury? ☐ Yes ☐ No
 - b. If lead and mercury are not included, has owner/operator proven this fact to Regional Administrator? ☐ Yes ☐ No
2. Does owner/operator perform a waste feed analysis in the Part B application? ☐ Yes ☐ No
3. Are waste analyses performed throughout normal operations? ☐ Yes ☐ No

Section B - Principal Organic Hazardous Constituents (POHC's) (Part 264)

1. Does owner/operator use POHC's in accordance with facility's permit specifications? ☐ Yes ☐ No

Section C - Performance Standards (Part 264)

1. Does incinerator burn at a destruction and removal efficiency (DRE) of at least 99.9999 percent for each POHC? ☐ Yes ☐ No
2. Do stack emissions of more than 1.8 kg/h of HCl exceed both 1.8 kg/h and 1 percent HCl in the stack? ☐ Yes ☐ No
3. Does incinerator emit particulates greater than 180 mg/dry standard cubic meter? ☐ Yes ☐ No

Section D - Permits

1. Are wastes burned although no permit is issued (Part 264)? ☐ Yes ☐ No
- (continued)

EXHIBIT IV-11 (continued)

- a. If yes, are wastes burned in a trial burn (Part 264)? ☐ Yes ☐ No
- OR
- b. Does owner/operator have an exemption due to 264.340 (Part 264) ☐ Yes ☐ No
- c. Does owner/operator burn hazardous waste during startup or shutdown if not allowed to do so in permit (Part 264)? ☐ Yes ☐ No
- d. Is waste feed cut off when operating requirements are not met (Part 264)? ☐ Yes ☐ No

Section E - Operating Requirements

1. Does incinerator operate per permit requirements (Part 264)? ☐ Yes ☐ No
2. Does owner/operator feed hazardous waste into incinerator when it is not at steady state (Part 265)? ☐ Yes ☐ No

Section F - Monitoring and Inspections

1. Does owner/operator conduct, at a minimum, the following:
- a. Existing instruments relating to combustion or emission control every 15 minutes (Part 265)? ☐ Yes ☐ No
- b. Is complete incinerator and associated equipment inspected daily for leaks, spills, and emissions, and are all emergency shutdown controls and system alarms checked (Part 265)? ☐ Yes ☐ No
- c. Are combustion temperature, waste feed rate, and combustion gas velocity all checked continuously (Part 264)? ☐ Yes ☐ No
- d. Is CO monitored continuously (Part 264)? ☐ Yes ☐ No
- e. Are waste and exhaust emissions sampled and analyzed (Part 264)? ☐ Yes ☐ No
- f. Is incinerator usually checked daily for leaks and spills (Part 264)? ☐ Yes ☐ No

(continued)

EXHIBIT IV-11 (continued)

g. Are emergency feed cutoff and alarms inspected weekly (Part 264)? ☐ Yes ☐ No

h. Are monitoring and inspection data recorded and placed in operating log (Part 264)? ☐ Yes ☐ No

Section G - Closure

1. Is a closure plan kept on site? ☐ Yes ☐ No

2. At closure, has owner/operator removed all hazardous waste residues from incinerator? ☐ Yes ☐ No

Section H - Interim Status (Part 265)

1. Does owner/operator burn F020, F021, F022, F023, F026, and/or F027 wastes? ☐ Yes ☐ No

a. If yes, does owner/operator possess certification from Assistant Administrator for Solid Waste and Emergency Response to do so? ☐ Yes ☐ No

EXHIBIT IV-12

THERMAL TREATMENT CHECKLIST
(PART 264 only)

NOTE: Applies to thermal treatment of hazardous waste in devices other than incinerators.

Section A - Operating Requirements

1. Is the process a noncontinuous (batch) process? ☒ Yes ☐ No
- a. If no, is the process operating at steady-state conditions (including temperature) before adding hazardous waste? ☐ Yes ☒ No
- b. Is a waste analysis documented in the operating record that includes:
- 1. Heating value? ☐ Yes ☐ No
 - 2. Halogen content? ☐ Yes ☐ No
 - 3. Sulfur content? ☐ Yes ☐ No
 - 4. Concentration of lead? ☐ Yes ☐ No
 - 5. Concentration of mercury? ☐ Yes ☐ No

NOTE: 4 and 5 not required if facility has written documented data that show the elements are not present.

2. Does the owner/operator monitor the following when thermally treating hazardous wastes:
- a. At least every 15 minutes, existing instruments which relate to the temperature and emission control:
- 1. Waste feed? ☐ Yes ☐ No
 - 2. Auxiliary fuel feed? ☐ Yes ☐ No
 - 3. Treatment process temperature? ☐ Yes ☐ No
 - 4. Relevant process flow? ☐ Yes ☐ No
 - 5. Relevant level controls? ☐ Yes ☐ No
- b. Stack plume (emissions) at least hourly:
- 1. Color (normal)? ☐ Yes ☐ No
 - 2. Opacity? ☐ Yes ☐ No

(continued)

EXHIBIT IV-12 (continued)

- c. Thermal treatment process equipment at least daily:
1. Pumps, valves, conveyors, pipes, etc., for leaks, spills, and fugitive emissions? ☐ Yes ☐ No
 2. Emergency shutdown controls? ☐ Yes ☐ No
 3. System alarms ☐ Yes ☐ No
- d. Construction materials of the treatment process or equipment at least weekly to detect corrosion or leaking of fixtures or seams? ☐ Yes ☐ No
- e. Construction materials of the area immediately surrounding discharge confinement structures at least weekly? ☐ Yes ☐ No

Section B - Closure

1. Is a closure plan maintained at the facility? ☐ Yes ☐ No

Section C - Open Burning

1. Is there evidence of any open burning of hazardous waste? ☐ Yes ☐ No
(Use narrative explanation sheet)
2. Is open burning or detonation of waste explosives conducted? ☐ Yes ☐ No
- a. If yes, is the detonation performed in accordance with the following table?

<u>Pounds of waste explosives or propellants</u>	<u>Minimum distance from open burning detonation to the property or others</u>
0-100	204 m (670 ft)
101-1,000	380 m (1250 ft)
1,001-10,000	530 m (1730 ft)
10,001-30,000	690 m (2260 ft)

Section D - Particulate Hazardous Waste

1. Does owner/operator burn F020, F021, F022, F023, F026, and/or F027 wastes? ☐ Yes ☐ No
- a. If yes, does owner/operator have documented permission from Assistant Administrator for Solid Waste and Emergency Response to do so? ☐ Yes ☐ No

EXHIBIT IV-12 (continued)

Section E - Closure

Does the facility maintain a closure plan? ☐ Yes ☐ No

Section F - Ignitable or Reactive Waste

1. Are ignitable or reactive wastes placed in the treatment process? ☐ Yes ☐ No

a. If yes, is the waste treated, rendered, or mixed before or immediately after being placed in the treatment process so it no longer meets the definition of ignitable or reactive? ☐ Yes ☐ No

Describe or attach a copy of the treatment.

Section G - Incompatible Wastes

1. Are incompatible wastes placed in the same treatment process or equipment? ☐ Yes ☐ No

2. Are hazardous wastes placed in washed equipment if equipment previously held incompatible waste? ☐ Yes ☐ No

EXHIBIT IV-13

GROUND-WATER MONITORING CHECKLIST

Section A - Monitoring System

1. Does the facility have a ground-water monitoring system in operation? ☒ Yes ☐ No
- a. If yes, does the system consist of:
1. Minimally one upgradient monitoring well (Part 265)? ☐ Yes ☐ No
2. Minimally three downgradient monitoring wells (Part 265)? ☐ Yes ☐ No
Corrective Action
- b. Are monitoring wells cased so that the integrity of the boreholes is maintained (Part 265)? ☐ Yes ☐ No
- c. Is a compliance monitoring system installed whenever hazardous waste constituents are detected at the compliance point (Part 264)? ☐ Yes ☐ No
- d. Is a corrective-action program initiated whenever the ground-water protection standard is exceeded (Part 264)? ☐ Yes ☐ No
- e. Is a detection monitoring program instituted in all other cases (Part 264)? ☐ Yes ☐ No
2. Does facility have a monitoring and response program (Part 264)? ☐ Yes ☐ No
- a. If yes, is a compliance monitoring system instituted whenever hazardous constituents are detected at the compliance point (Part 264)? ☐ Yes ☐ No
- b. Whenever the ground-water protection standard is exceeded, does facility institute a corrective-action program (Part 264)? ☐ Yes ☐ No
- c. In all other cases, does facility institute a detection monitoring program (Part 264)? ☐ Yes ☐ No

Section B - Sampling and Analysis (Part 265 only)

1. Does the facility obtain and analyze samples from the ground-water monitoring system? ☐ Yes ☐ No

(continued)

EXHIBIT IV-13 (continued)

1. Has facility developed and followed a ground-water sampling and analysis plan? ☐ Yes ☐ No
- a. If yes, does this plan include procedures and techniques for:
- 1. Sample collection? ☐ Yes ☐ No
 - 2. Sample preservation? ☐ Yes ☐ No
 - 3. Analytical procedures? ☐ Yes ☐ No
 - 4. Chain-of-custody control? ☐ Yes ☐ No
- b. Does the facility determine the concentration or value of the following parameters in ground-water samples?
- 1. Parameters characterizing the suitability of the ground water as a drinking water supply, as specified in §265, Appendix 3? ☐ Yes ☐ No
 - 2. Parameters establishing ground-water quality (chloride, iron, manganese, phenols, sodium, sulfate)? ☐ Yes ☐ No
 - 3. Parameters used as indicators of ground-water contamination (pH, specific conductance, total organic carbon, total organic halogen)? ☐ Yes ☐ No
- c. Has the owner/operator established initial background concentrations or values of all parameters specified above at least on a quarterly basis? ☐ Yes ☐ No
- d. Has owner/operator obtained at least four replicate measurements for each sample, and has he determined the initial background arithmetic mean and variance? ☐ Yes ☐ No
- e. After the first year, does owner/operator sample and analyze with the following frequencies:
- 1. Samples collected to establish background quality (from above)? ☐ Yes ☐ No
 - 2. Samples collected to indicate contamination (from above)? ☐ Yes ☐ No
 - 3. Elevation of ground-water surface at each monitoring well at each sampling event? ☐ Yes ☐ No

Section C - Preparation, Evaluation, and Response (Part 265 only)

1. Did owner/operator prepare an outline of a ground-water quality assessment program? ☐ Yes ☐ No

(continued)

EXHIBIT IV-13 (continued)

a. If yes, did program determine the following:

- | | |
|---|--|
| 1. Whether hazardous waste or hazardous waste constituents have entered the ground water? | <input type="checkbox"/> Yes <input type="checkbox"/> No |
| 2. Rate and extent of hazardous waste or hazardous waste constituent migration? | <input type="checkbox"/> Yes <input type="checkbox"/> No |
| 3. Concentrations of hazardous waste or hazardous waste constituents in ground water? | <input type="checkbox"/> Yes <input type="checkbox"/> No |

b. For each well, has owner/operator calculated the arithmetic mean and variance, based on four replicate measurements for each sample, and compared the results with initial background mean? ☐ Yes ☐ No

c. Has owner/operator submitted information documenting any significant increase in comparisons for upgradient wells (or decrease in pH)? ☐ Yes ☐ No

d. If the comparisons for downgradient wells show a significant increase (or pH decrease), has the owner/operator obtained additional ground-water samples from those downgradient wells in which a significant decrease was detected? (Samples must be split in two, and analyses must be obtained of all additional samples to determine whether the significant difference was a result of lab error?) ☐ Yes ☐ No

1. If analyses (described above) were performed, and confirmed the significant increase (or pH decrease), did owner/operator notify Regional Administrator within 7 days? ☐ Yes ☐ No

2. If analyses confirmed significant increase (or pH decrease), did owner/operator submit to the Regional Administrator within 14 days after notification (discussed above) a certified ground-water quality assessment program? ☐ Yes ☐ No

a. If yes, does plan include the following:

- | | |
|---|--|
| 1. Number, location, and depth of wells? | <input type="checkbox"/> Yes <input type="checkbox"/> No |
| 2. Sampling and analytical methods for those hazardous wastes and hazardous waste constituents at the facility? | <input type="checkbox"/> Yes <input type="checkbox"/> No |
| 3. Evaluation procedures, including any use of previously gathered ground-water quality information? | <input type="checkbox"/> Yes <input type="checkbox"/> No |
| 4. Schedule of implementation? | <input type="checkbox"/> Yes <input type="checkbox"/> No |

(continued)

EXHIBIT IV-13 (continued)

3. Aid owner/operator implement the ground-water qualify-assessment program and, at a minimum, did he determine the following: __Yes __No
- a. Rate and extent or migration of the hazardous waste constituents in the ground water? __Yes __No
- b. Concentrations of the hazardous waste in the ground water? __Yes __No
4. Did owner/operator submit a report to Regional Administrator containing the requests of the assessment outlined in No. 3 above within 15 days? __Yes __No
5. Did owner/operator notify Regional Administrator of reinstatement of indicator evaluation program upon finding that no hazardous waste or hazardous waste constituents had entered the ground water? __Yes __No
6. If owner/operator determined that hazardous waste or hazardous waste constituents entered the ground water, did he either continue to make the determinations listed in No. 3 above on a quarterly basis until final closure or ground-water quality-assessment plan was implemented prior to post-closure care, or cease to make determinations required in No. 3 above if ground-water quality-assessment plan was implemented during post-closure? __Yes __No
7. If any ground-water quality-assessment program is implemented to satisfy No. 3 above prior to final closure, has owner/operator completed program and reported to Regional Administrator, as outlined in No. 4 above? __Yes __No
8. If owner/operator does not monitor at least annually to satisfy No. 3 above, does owner/operator evaluate data on ground-water elevation obtained under No. 2e in Section B above to determine whether the requirements for locating monitoring wells are satisfied? __Yes __No
- a. If evaluation shows that the requirements for monitoring wells are not satisfied, has owner/operator modified the number, location, or depth of the monitoring wells to bring the system into compliance? __Yes __No

(continued)

EXHIBIT IV-13 (continued)

Section D - Recordkeeping and Reporting (Part 265 only)

1. Unless owner/operator is monitoring to satisfy the requirements of §265.93(d)(4), does owner/operator:
 - a. Keep records of the analyses required in §265.92(c) and (d), ground-water surface elevations required in 265.93(b) throughout the active life of the facility and throughout post-closure? ☐ Yes ☐ No
 - b. Report the following information to the Regional Administrator:
 1. Within 15 days of analysis for each quarterly sampling event, does owner/operator submit results of background concentrations? ☐ Yes ☐ No
 2. Does owner/operator inform Regional Administrator about any parameters that exceed maximum contaminant levels listed in Appendix III? ☐ Yes ☐ No
 3. (Annually) does owner/operator report concentrations or values of parameters listed in §265.92(b)(3) for each well, including required evaluations for these parameters under §265.93(b)? ☐ Yes ☐ No
 - a. Does owner/operator also identify differences from initial background concentrations found in the upgradient wells no later than March 1 following each calendar year? ☐ Yes ☐ No
2. Does owner/operator submit results of the ground-water surface elevations under §265.93(f), along with a description of the response, if needed? ☐ Yes ☐ No
3. If ground water is monitored to satisfy requirements of §265.93(d)(4), did owner/operator do the following:
 - a. Keep records of analyses and evaluations specified in the plan throughout active life and post-closure? ☐ Yes ☐ No
 - b. (Annually, until final closure) submit to the Regional Administrator a report containing the results of the ground-water quality assessment program, including the calculated rate of migration of hazardous waste or hazardous waste constituents by March 1? ☐ Yes ☐ No

(continued)

EXHIBIT IV-13 (continued)

Section E - General Requirements (Part 264 only)

1. Does facility comply with the following requirements?
 - a. Are sufficient wells installed at appropriate locations and depths? ☐ Yes ☐ No
 - b. Have sampling and analysis techniques been consistent? ☐ Yes ☐ No
 - c. Have ground-water elevation data been recorded? ☐ Yes ☐ No
 - d. Have background concentrations been determined? ☐ Yes ☐ No
2. If ground water is monitored to satisfy requirements of §265.93(d)(4), owner/operator must:
 - a. Keep records of the analyses and evaluations specified in the plan throughout the facility's active life, and, for disposal facilities, throughout post-closure. ☐ Yes ☐ No
 - b. Report the following ground-water monitoring information:
 1. During the first year when initial background concentrations are being determined, did owner/operator submit values within 15 days after completing analysis? ☐ Yes ☐ No
 2. If yes, did owner/operator also submit an identification of any parameters whose concentrations exceed maximum levels in Appendix III? ☐ Yes ☐ No
 3. (Annually) did owner/operator report concentrations or values of the parameters listed in §265.92(b)(2) for each well, along with required evaluations for these parameters under §265.93(b)? ☐ Yes ☐ No
 4. Did owner/operator also separately identify any significant differences from initial background concentrations for upgradient wells? ☐ Yes ☐ No
 5. Did owner/operator report on the results of ground-water surface elevations (and a description of the results if necessary) by March 1 of the following year? ☐ Yes ☐ No

Section F - Detection Monitoring Program (Part 264 only)

1. Has owner/operator established detection monitoring system to provide reliable indications for detection releases? ☐ Yes ☐ No

(continued)

EXHIBIT IV-13

a. If yes, are the following components included in the system:

- | | | |
|--|------------------------------|-----------------------------|
| 1. Background values? | <input type="checkbox"/> Yes | <input type="checkbox"/> No |
| 2. Determination of ground-water flow rate? | <input type="checkbox"/> Yes | <input type="checkbox"/> No |
| 3. Determination of ground-water compliance point semiannually? | <input type="checkbox"/> Yes | <input type="checkbox"/> No |
| 4. Determination of statistically significant increases over background concentrations? | <input type="checkbox"/> Yes | <input type="checkbox"/> No |
| 5. Notification to Regional Administrator if there was a statistically significant increase? | <input type="checkbox"/> Yes | <input type="checkbox"/> No |

Section G - Compliance Monitoring Program (Part 264 only)

- | | | |
|--|------------------------------|-----------------------------|
| 1. Does facility operate a compliance monitoring program? | <input type="checkbox"/> Yes | <input type="checkbox"/> No |
| a. Does facility determine concentrations of hazardous constituents at least quarterly? | <input type="checkbox"/> Yes | <input type="checkbox"/> No |
| b. Does facility determine ground-water flow rate and direction in uppermost aquifer annually? | <input type="checkbox"/> Yes | <input type="checkbox"/> No |
| c. Does facility analyze samples for Appendix VIII constituents annually? | <input type="checkbox"/> Yes | <input type="checkbox"/> No |
| d. Does facility make statistically significant increases over background values? | <input type="checkbox"/> Yes | <input type="checkbox"/> No |
| e. If there is an increase, does facility notify Regional Administrator and submit to establish a corrective-action program? | <input type="checkbox"/> Yes | <input type="checkbox"/> No |

Section H - Corrective-Action Program (Part 264 only)

- | | | |
|--|------------------------------|-----------------------------|
| 1. Does facility follow a corrective-action program that meets the facility's permit requirements? | <input type="checkbox"/> Yes | <input type="checkbox"/> No |
|--|------------------------------|-----------------------------|

*See RCRA Ground-Water Monitoring Systems (OSWER Nos., 9950.2, 9950.3, 9950.4)

WASTE INFORMATION WORKSHEET
(To be filled out for each facility waste)

WASTE NAME: _____

PROCESS GENERATING THE WASTE: Tank cleaning, waste oil, machine
cooling

HOW HAS FACILITY CLASSIFIED THE WASTE ?

HAZARDOUS _____ (if so, list waste code) NON-HAZARDOUS _____

HOW HAS FACILITY MADE THIS DETERMINATION ?

TESTING _____ PROCESS KNOWLEDGE _____

ARE ANY TEST RESULTS AVAILABLE ?

YES _____ (if so, look at) NO _____

WASTE GENERATION RATE: _____

DISPOSAL PROCEDURE:

CURRENT _____

PAST _____

HAVE MANIFESTS BEEN USED FOR OFF-SITE SHIPMENT ?

YES _____ (if so, look at) NO _____

IS WASTE SUBJECT TO LAND DISPOSAL RESTRICTIONS UNDER 40 CFR 268 ?

IS WASTE SUBJECT TO EXCLUSIONS UNDER 40 CFR 261.4 ?